

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY S. VAUGHN, individually and on
behalf of those Class Members similarly
situated,

Plaintiff,

v.

LEEDS, MORELLI & BROWN, P.C., LEEDS,
MORELLI & BROWN, L.L.P., LEEDS &
MORELLI, LEEDS, MORELLI & BROWN,
PRUDENTIAL SECURITIES, INC.,
PRUDENTIAL FINANCIAL, INC., LENARD
LEEDS, STEVEN A. MORELLI, JEFFREY K.
BROWN, and JOHN DOES, JAMES VAGNINI,
FREDERIC DAVID OSTROVE, ROBERT
JOHN VALLI, JR., DISCRIMINATION ON
WALL STREET, INC. DISCRIMINATION ON
WALL STREET MANHATTAN, INC., JOHN
DOES, 1-10 AND JANE DOES, 1-10 a fictitious
designation for presently unknown licensed
attorneys, professionals and/or unknown persons
or entities,

Defendants.

04 Civ. 08391 (DLC)

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that upon the Affidavit of Liza M. Velazquez,
sworn to September 14, 2007, together with the exhibits thereto, the accompanying
Memorandum of Law, and all prior papers and proceedings in this action, and in National
Association of Securities Dealers Arbitration No. 06-00534 ("NASD Proceeding"),
Defendants Prudential Securities, Inc. and Prudential Financial, Inc will cross-move this
Court, before the Honorable Denise L. Cote, at the United States Courthouse, 500 Pearl
Street, New York, New York 10007, at a date and time to be determined by the Court, for

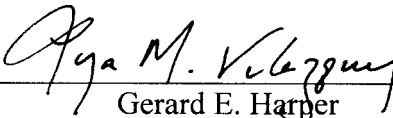
an Order pursuant to 9 U.S.C. § 9, confirming the arbitrators' award in the NASD Proceeding and for such other and further relief as may be just and proper.

Dated: New York, New York
September 14, 2007

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

By: _____


Gerard E. Harper
Theodore V. Wells, Jr.
Liza M. Velazquez

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-and-

LOWENSTEIN SANDLER, P.C.
1330 Avenue of the Americas
New York, New York 10019

Of Counsel:
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Prudential Financial, Inc.

TO:

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Attorneys for Leeds, Morelli & Brown, P.C.,
and individual Defendant members or
associates of Leeds, Morelli & Brown, P.C.